

Katie A. Settlement Notice Plan

The parties have elected to forego sending notice to each class member because of the significant difficulties and substantial expense in identifying class members — children and young adults who “are in or at risk of foster care placement,” have “a mental illness or condition that has been documented or, had an assessment already been conducted, would have been documented,” and “need individualized mental health services” — and mailing notices to these tens of thousands of individuals. Instead, the parties propose that notice be given to the class in all of the following ways:

1. In general, the notice and the settlement with all its appendices will be available in both English and Spanish.
2. CDSS, CDHCS and CDMH will post the notice and the entire settlement on their respective websites. At least some of plaintiffs’ counsel will also post the notice and the entire settlement on their respective websites.
3. CDMH will distribute the notice and entire settlement (or a link to them) to the counties with a request that the notice and entire settlement be posted in prominent locations in county offices providing mental health services to children and youth. Plaintiffs have requested that counties be instructed to post the notice in prominent locations. State defendants are considering this request and will update the Court on the status of it on September 12, 2011 if necessary.

4. CDMH has made arrangements with the United Advocates for Children and Families ("UACF"), wherein UACF has agreed to e-mail the notice to the more than 1500 family members, youth and child serving agencies that belong or are affiliated with UACF. UACF's mission is to improve the quality of life for all children and youth with mental health, emotional, and behavioral challenges.
5. CDSS will distribute the notice and entire settlement (or a link to them) to the counties with an instruction that the notice and entire settlement be posted in prominent locations in county offices providing child welfare services.
6. CDSS will mail the notice to all group home providers with an instruction that they post the notice in their group homes.
7. CDSS has made arrangements with the Administrative Office of Courts ("AOC") which has a database of approximately 850 court- appointed attorneys representing children or parents. AOC has agreed to e-mail the notice (or a link to it) to approximately 600 attorneys for whom it has an e-mail address. AOC has also agreed to post the notice on CalDOG, a resource website for attorneys, social workers, Court Appointed Special Advocates ("CASAs") and others.
8. CDSS has made arrangements with the California CASA Association which has agreed to send the notice to its county CASA associations with a request that these county associations share this information with

the CASAs.

9. CDSS will e-mail the notice (or a link to it) to the 58 County Foster Care Ombudsmen offices and instruct the offices to share the information as well as post the notice on the State and local Ombudsmen websites.
10. CDSS will e-mail the notice (or a link to it) to the California Caregiver Advocacy Network. The Network is comprised of foster parents and foster parent associations, parent advocates and kinship parents.
11. CDSS will mail the notice to the more than 200 Foster Family Agencies ("FFAs") with a request that the FFAs e-mail the notice to the foster families these FFAs have certified (provided that the particular FFA has the email capacity to send out the notice).
12. CDSS has made arrangements with the California Alliance of Child and Family Services ("California Alliance") wherein the California Alliance has agreed to email the notice (or a link to it) to the more than 130 private nonprofit child and family serving agencies that belong to this organization.
13. CDSS has made arrangements with the Chancellor's Office for the California Community Colleges wherein the Chancellor's Office has agreed to e-mail the notice (or a link to it) to the 66 community colleges that provide foster parent training with instructions to share the notice with foster parents and the foster parent education instructors.

14. CDSS has made arrangements with the Resource Center for Family Practice at University of California Davis, wherein the Resource Center will e-mail the notice (or a link to it) to its distribution list of previous Wraparound Institute participants, which includes foster youth, parent partners, residential providers, probation officers, county staff, foster parents social workers and mental health clinicians.
15. CDSS will distribute the notice (or a link to it) to its e-mail distribution list of the directors of the county probation programs and to the County Welfare Directors Association.
16. CDSS has made arrangements with the California Youth Connection to post the notice on its website and to e-mail the notice (or a link to it) to its statewide distribution list, which includes three regional offices. California Youth Connection is a youth organization lead by former foster youth.
17. CDSS will e-mail the notice (or a link to it) to its e-mail distribution list of County Independent Living Coordinators instructing them to share the information with their staff and foster youth.
18. CDSS will distribute the notice and entire settlement (or a link to them) to its e-mail distribution list of the Transitional Housing Programs with an instruction that the notice and entire settlement be posted in prominent locations in their sites that provide transitional housing services.

19. Plaintiffs' counsel will arrange to post the notice on the National

Association of Counsel for Children's listserve, which includes several hundred dependency attorneys and approximately 30% of its members are dependency attorneys in California.

20. Plaintiffs' counsel will arrange to post the notice on the Benchmark

Institute's listserve in California, which includes over 300 legal services attorneys, paralegals and other child welfare advocates.

21. CDHCS is working to secure arrangements to distribute the notice

and/or the entire settlement to psychiatric hospitals and public health nurses. State defendants will update the Court on CDHCS' progress on September 12, 2011.